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Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR SUR-REPLY TO
WAYMO'S MOTION TO COMPEL UBER
SOURCE CODE**

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Uber Technologies, Inc. and
7 Ottomotto LLC's Administrative Motion to File Under Seal Their Sur-Reply to Waymo's Motion to
8 Compel Uber Source Code (the "Administrative Motion"). The Administrative Motion seeks an order
9 sealing highlighted portions of Defendants' Sur-Reply to Waymo's Motion to Compel ("Uber's Sur-
10 Reply"), the Declaration of Don Burnette ("Burnette Declaration"), and Exhibit 1 to the Declaration of
11 Esther Chang ("Chang Exhibit 1"), as well as the entirety of Exhibits A-B to the Declaration of Don
12 Burnette ("Burnette Exhibits A-B") and Exhibit 2 to the Declaration of Esther Chang ("Chang Exhibit
13 2").

14 3. The green and blue highlighted portions of Uber's Sur-Reply, of the Burnette
15 Declaration, and of Chang Exhibits 1-2, as well as the entirety of Burnette Exhibits A-B contain or
16 refer to trade secrets and confidential business information, which Waymo seeks to seal.

17 4. Uber's Sur-Reply (green highlighted portions), the Burnette Declaration (green and
18 blue highlighted portions), Burnette Exhibits A-B (entire documents), Chang Exhibit 1 (green and
19 blue highlighted portions), and Chang Exhibit 2 (portions highlighted in green in version filed
20 herewith) contain, reference, and/or describe Waymo's asserted trade secrets, including as
21 misappropriated by Defendants. The information Waymo seeks to seal includes the confidential
22 design and functionality of Waymo's proprietary autonomous vehicle system, including its source
23 code, which Waymo maintains as secret. I understand that these trade secrets are maintained as secret
24 by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31).
25 The public disclosure of this information would give Waymo's competitors access to descriptions of
26 the functionality or features of Waymo's autonomous vehicle system. If such information were made
27 public, I understand that Waymo's competitive standing would be significantly harmed.

